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DAWN D. McDONALD*

*ALSO ADMITTED IN CONNECTICUT

FILE NO. 24334.1

November 22, 2005

Mr. Jeffrey McCormick, Esq.
Robinson, Donovan, Madden & Barry
1500 Main Street
Box 15609
Springfield, MA 01115

RE: Deborah St. Peter and Matthew Bogacz v. Agawam Police Department, et al.
Civil Action No. 04-30054-MAP

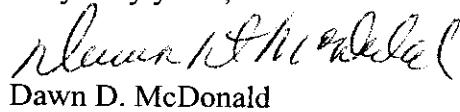
Dear Attorney McCormick:

Enclosed please find Deposition Notices relative to the above-referenced matter. They are as follows:

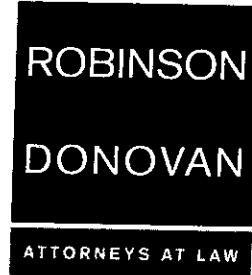
1.	Anthony Grasso	December 15, 2005	9:00 a.m.
2.	James Wheeler	December 15, 2005	1:30 p.m.
3.	Richard Niles	December 16, 2005	9:00 a.m.
4.	Officer McGovern	December 16, 2005	1:30 p.m.
5.	Detective Jennifer Blanchette	December 19, 2005	9:00 a.m.
6.	Chief Robert Campbell	December 19, 2005	1:30 p.m.

Thank you for your attention to this matter.

Very truly yours,


Dawn D. McDonald

DDM/mdb
cc. Deborah St. Peter
Matthew Bogacz



Jeffrey L. McCormick, Esq.

jmccormick@robinson-donovan.com

November 23, 2005

Dawn D. McDonald, Esq.
Cooley Shrair, P.C.
1380 Main Street
Springfield, MA 01103

RE: Deborah St. Peter and Matthew Bogacz v. Town of Agawam, Town of Agawam Police Department, Agawam Police Chief Robert Campbell, Anthony Grasso, James Wheeler, Richard Niles, Keith Bopko, John Moccio, and Officer McGovern United States District Court Civil Action No. 04-30054-MAP

Dear Dawn:

I am just now in receipt of your November 22 letter and the deposition notices included therein. While I realize that we are both anxious to get back to discovery, I am not going to be able to do these depositions during the month of December, as my calendar is full. Among other things, I already have trials that are scheduled in Housing Court, Berkshire County Superior Court, and the U.S. District Court for the month of December. I have at least one other serious mediation, as well as many other commitments.

I am sure we can work out new dates for these depositions and I shall be in touch with you in that regard so that we can arrange them sometime in January.

Best regards,

Sincerely,

A handwritten signature in black ink, appearing to read "JLM". Below the signature, the name "Jeffrey L. McCormick" is printed in a smaller, standard font.

JLM:lam

414599

ROBINSON DONOVAN, P.C.

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DAWN D. McDONALD*

*ALSO ADMITTED IN CONNECTICUT

FILE NO. 24334.001

November 28, 2005

Mr. Jeffrey L. McCormick, Esq.
Robinson, Donovan Madden & Barry P.C.
1500 Main Street
Box 15609
Springfield, MA 01115

RE: Deborah St. Peter and Matthew Bogacz v. Town of Agawam, et al.
Civil Action No. 04 30054 MAP

Dear Attorney McCormick:

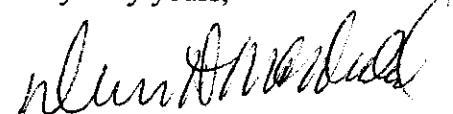
Please be advised that I am in receipt of your letter dated November 23, 2005, regarding your inability to attend the depositions of your clients which I noticed for December 15, 16, and 19. You further stated that you would be unable to attend any depositions at any time during the month of December.

As I am sure you are aware, reasonable notice is all that is required under the Federal Rules. These notices were hand delivered to you on November 22, 2005, almost a full month in advance. Once again your excuse for your inability to attend is your extremely busy schedule. As you are aware, I have been more than accommodating with respect to your schedule since the beginning of this litigation. We have more than once assented to extensions both formal and informal in order to accommodate your busy schedule. Apparently, there is still no end in sight.

In an effort to be efficient and cost effective for our clients, we agreed to suspend our pending discovery disputes and the taking of the Defendants' depositions in an effort to mediate this case. As you know, that effort was unsuccessful to say the least. That being said, all discovery issues are back on the table, and I have depositions to complete. My clients would like to move this litigation forward to conclusion as quickly as possible. They are no longer willing to accommodate your schedule and will not agree to any further delays. If you are unable to attend the depositions as noticed, I would request that you make arrangements for another attorney in your office to cover for you.

Jeffrey L. McCormick, Esq.
November 28, 2005
Page 2

Very truly yours,



Dawn D. McDonald

DDM/mdb
cc: ~~Deborah St. Peter~~
~~Matthew Bogacz~~